

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**REPLY DECLARATION OF  
RUDOLPH W. GIULIANI**

Pursuant to 28 U.S.C. § 1746, I, Rudolph W. Giuliani, declare and state under penalties of perjury that:

1. I am the Defendant in this action.
2. I respectfully submit this Reply Declaration in support of my cross-motion for summary judgment [ECF 41] regarding Plaintiffs' efforts to enforce their judgment against my condominium unit, located at 315 South Lake Drive, Unit 5D, Palm Beach, Florida (the "Palm Beach Condo").
3. As shown by my prior Declaration [ECF 42] and the exhibits attached to that Declaration, I acquired homestead status for the Palm Beach Condo by and before May 26, 2024, when I temporarily departed Florida for the summer months. *See* ECF 42; 42-1-9 (Giuliani Declaration and Exhibits); ECF 43 (Labkowski Declaration).
4. On and/or after May 26, I certainly did not establish a domicile at some place other than the Palm Beach Condo. On the contrary, when I left Florida, and at all times thereafter, I intended to return to the condo and continue to maintain the condo as my permanent residence.

5. I understand that Plaintiffs challenge my homestead status as of July 1, 2024. However, as I previously stated, from July 1, 2024, through July 10, 2024, and August 8, 2024 (dates to which, as I understand it, Plaintiffs point), I was absent from Florida for reasons of health, leisure and/ or business. *See* ECF 42 (Giuliani Declaration) ¶ 16 and ECF 42-9 (Exhibit I); ECF 43 (Labkowski Declaration). Also, during that time period, I was in six different states and two foreign countries.

6. During that time period:

(a) I intended to return to Florida and to the Palm Beach Condo.

(b) With respect to the Palm Beach Condo: I did not remove my furniture; I did not terminate utility services; I did not rent it out.

(c) I left my Florida driver's license, auto registration, and voter registration intact. I did not obtain a driver's license, an auto registration, or a voter registration in any other state.

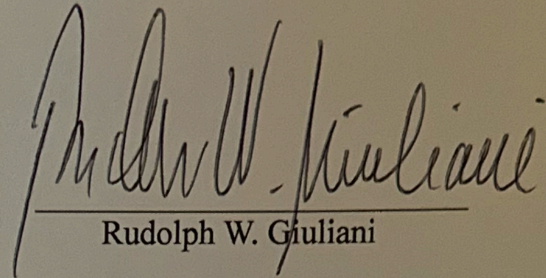
(d) I made a formal declaration of Florida domicile, which was recorded in the office of the Palm Beach County Clerk. *See* ECF 42-8 (Exhibit H to my prior Declaration).

7. I returned to Florida, and to my condo, on or before September 23, 2024. On that date, I broadcasted from Palm Beach, Florida, an episode entitled "America's Mayor Live (501): U.S. Sending Additional Troops to Middle East as Tensions Rise." I hereby make the foregoing video recording available by means of the following link: [https://rumble.com/v5g2twd-americas-mayor-live-501-u.s.-sending-additional-troops-to-middle-east-as-te.html?e9s=src\\_v1\\_ucp](https://rumble.com/v5g2twd-americas-mayor-live-501-u.s.-sending-additional-troops-to-middle-east-as-te.html?e9s=src_v1_ucp).



I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge information and belief.

Dated: November 4th, 2024



Rudolph W. Giuliani